

EXHIBIT “A”

VIA eCOURTS

LAW OFFICES OF SANDER BUDANITSKY, LLC
520 WEST FIRST AVENUE
ROSELLE, NEW JERSEY 07203
(908)241-3445 * FAX (908)241-4595
ATTORNEY FOR PLAINTIFF(s)
ATTORNEY ID # 18381996

ALEJANDRO ARENDS,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ESSEX COUNTY
DOCKET NO.: ESX-L-

Plaintiff(s),

v.

CIVIL ACTION

RAYMOND J. SCHMERIN and
LORD'S CARTING, L.L.C.,

COMPLAINT AND JURY DEMAND

Defendant(s),

The Plaintiff, **ALEJANDRO ARENDS**, residing in the City of Newark, County of Essex in the State of New Jersey, by way of Complaint against the Defendants says:

FIRST COUNT

1. On or about the 14TH day of November 2019 Plaintiff **ALEJANDRO ARENDS**, was the operator of a motor vehicle, which was traveling North on Broad Street and about its intersection with Lafayette Street in the City of Newark, County of Essex and State of New Jersey.

2. At all times relevant and material to this Complaint, the Defendant(s), **RAYMOND J. SCHMERIN**, operated a motor vehicle owned by the Defendant(s), **LORD'S CARTING, L.L.C.**, with the permission and consent, express or implied, of said owner.

3. At all times relevant and material hereto, the Defendant(s), **RAYMOND J. SCHMERIN**, was an employee, agent and/or servant of the Defendant(s), **LORD'S CARTING, L.L.C.**, acting within the scope of his/her employment and/or agency.

4. At the above time and place, the Defendant(s), **RAYMOND J. SCHMERIN**, failed to keep his/her vehicle under reasonable and proper control and so carelessly, recklessly and negligently operated his/her motor vehicle, among other things, failing to make proper observations, driving at an excessive rate of speed, and being otherwise inattentive, so as to cause his/her motor vehicle to violently collide with the Plaintiff's vehicle.

5. This accident resulted solely from the negligence and carelessness of the Defendant(s) herein and was due in no part on any act, or failure to act, on the part of the Plaintiff(s).

6. As a direct and proximate result of the foregoing, the Plaintiff, **ALEJANDRO ARENDS**, was caused to sustain serious, painful and permanent injuries, has experienced great pain and suffering, has suffered great shock and mental anguish, will in the future experience great pain and suffering, was caused to incur great expenses for medical care and attention, will in the future incur additional expenses, was caused to lose large sums of money for wages he would have earned but for his injuries and will in the

future lose large sums of money for wages, and has in the past, and will in the future, lose his right to the full enjoyment of life.

WHEREFORE, the Plaintiff, **ALEJANDRO ARENDS**, hereby demands judgment against the Defendants, **RAYMOND J. SCHMERIN and/or LORD'S CARTING, L.L.C.**, both jointly and severally, together with interest and cost of suit.

DATED: October 25, 2021



SANDER BUDANITSKY, ESQ.
Attorney for Plaintiff(s)

JURY DEMAND

Plaintiff demands a trial by jury as to all Counts of the within Complaint.



SANDER BUDANITSKY, ESQ.
Attorney for Plaintiff(s)

DATED: October 25, 2021

CERTIFICATION

In accordance with Rule 4:5-1, I hereby certify that, to the best of my knowledge, the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any other action or arbitration contemplated. I further certify that, to the best of my knowledge, no other party should be joined in this action, and I am not aware of any other parties that are subject to joinder.

DATED: October 25, 2021


SANDER BUDANITSKY, ESQ.
Attorney for Plaintiff(s)

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to Rule 4:25-4, Sander Budanitsky, Esq., is hereby designated trial counsel.

DATED: October 25, 2021


SANDER BUDANITSKY, ESQ.
Attorney for Plaintiff(s)

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-007991-21

Case Caption: ARENDS ALEJANDRO VS SCHMERIN RAYMOND

Case Initiation Date: 10/25/2021

Attorney Name: SANDER BUDANITSKY

Firm Name: SANDER BUDANITSKY LLC

Address: 520 WEST FIRST AVENUE

ROSELLE NJ 07203

Phone: 9082413445

Name of Party: PLAINTIFF : ARENDS, ALEJANDRO

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: ALEJANDRO ARENDS? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/25/2021
Dated

/s/ SANDER BUDANITSKY
Signed

